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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

BARBARA LIOUDIS

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*(In the space above enter the full name(s) of the plaintiff(s).)*

- against -

HIGH CORPORATE SERVICES, LLC d/b/a /HAMPTON INN

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MANTUA MANUFACTURING CO

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**16 1708**

**COMPLAINT**

Jury Trial:  Yes  No

(check one)

**FILED**

**APR 11 2016**

MICHAEL E. KUNZ, Clerk  
By JV Dep Clerk

*(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)*

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	BARBARA LIOUDIS
	Street Address	135 Vin Gate Drive
	County, City	Monroe County, Rochester
	State & Zip Code	New York 14616
	Telephone Number	585-621-8269

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- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name HIGH CORPORATE SERVICES, LLC, d/b/a /HAMPTON INN  
 Street Address 1853 William Penn Way  
 County, City Lancaster, Lancaster  
 State & Zip Code PA 17605.

Defendant No. 2

Name MANTUA MANUFACTURING CO.  
 Street Address 7900 Northfield Rd  
 County, City Cuyahoga, Cleveland  
 State & Zip Code Ohio 44146

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)  
 Federal Questions       Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New York

Defendant(s) state(s) of citizenship Pennsylvania

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Hampton Inn hotel located at 545 Greenfield Road, Lancaster, Pennsylvania 17601

B. What date and approximate time did the events giving rise to your claim(s) occur? April 16, 2014,

What happened to you?

C. Facts: A piece of metal sticking out from a bed frame in my hotel room at the Hampton Inn hotel caught my leg and cut me causing me severe injury. Also, please see the attached sworn affidavit of Barbara Lioudis which is made a part hereof and incorporated herein by reference.

Who did what?

High Corporate Services, LLC d/b/a /Hampton Inn, the owner of the hotel allowed the hotel room to exist in a dangerous and unsafe condition with the metal sticking out from the bed frame. Also please see the attached sworn affidavit of Barbara Lioudis which is made a part hereof and incorporated herein by reference. Mantua Manufacturing Co. made the bed frame with a bad, unsafe and dangerous design whereby a piece of metal was sticking out from under the bedframe putting users at risk of being injured by the protruding piece of metal.

Was anyone else involved?

Mantua Manufacturing Co., as stated above is involved as the manufacturer of the bed frame.. Also, please see the attached sworn affidavit of Barbara Lioudis which is made a part hereof and incorporated herein by reference.

Who else saw what happened?

Betty Rienholtz was present in the hotel room when the incident happened. I also showed hotel management my injuries and the bed frame. A group of people I was with also saw my injuries after the incident. Also, please see the attached sworn affidavit of Barbara Lioudis which is made a part hereof and incorporated herein by reference.

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**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. I was severely cut on my legPlease see the attached sworn statement of Barbara Lioudis which is made a part hereof and incorporated herein by reference.

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

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I am seeking monetary compensation for my emotional pain and suffering, medical bills, etc. in the amount of \$200,000 and/or in an amount to be determined by a jury in this case.

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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8th day of April, 2016.

Signature of Plaintiff Barbara Linds

Mailing Address 135 Vin Gate Drive  
Rochester, NY 14616

Telephone Number 585-621-8269

Fax Number (*if you have one*) \_\_\_\_\_

E-mail Address \_\_\_\_\_

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_

Inmate Number \_\_\_\_\_

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

16 1708

BARBARA LIOUDIS,

Plaintiff,

v.

SWORN AFFIDAVIT OF  
BARBARA LIOUDIS

Defendants.

State of New York) ss:  
County of Monroe)

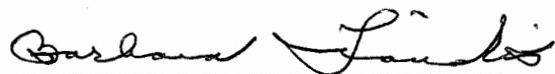
Barbara Lioudis being duly sworn deposes and says:

1. On April 16, 2014, I, Ms. Barbara Lioudis was injured while staying at the Hampton Inn located in Lancaster, Pennsylvania.
2. This occurred as a result of a metal bar that was sticking out from the frame of the bed in my hotel room.
3. This bar was hidden by the bed's dust ruffle and caught my leg as I walked by, causing a severe laceration.
4. I experienced severe pain, bleeding and swelling to my right leg.
5. The leg laceration measured at least 12 centimeters long and I was required to receive at least 30 sutures to close the wound, as well as a tetanus shot and was prescribed antibiotics.
6. Despite this, the skin lateral to the laceration later developed ecchymosis, was blistered and demonstrated signs of tissue necrosis.
7. Even after the removal of the sutures, I continued to deal with complications such as painful blistering and bleeding and I was required to wear an unna boot for a number of months.

8. My symptoms and treatments continued for several months, during which time my leg injury hindered my ability to walk and accomplish a host of everyday chores and activities.
9. The acts or omissions of Defendant High Corporate Services LLC/Hampton Inn ("Hampton Inn") which constituted negligence, carelessness and recklessness in this actions are as follows:
10. Defendant Hampton Inn suffered, caused and permitted the premises which includes the rooms and items provided to guests and me to become and remain in a dangerous and defective condition; failed to make regular inspections of the premises and failed to maintain the same in a safe condition; failed to take means or precautions to ensure safe passage upon the premises.
11. With prior and/or actual and/or constructive notice and knowledge of the use of the premises being made by members of the general public, guest and particularly the me, the defendant Hampton Inn did fail to take proper and adequate measures to prevent, correct and/or eliminate the hazardous and dangerous conditions on the premises.
12. With notice and knowledge as aforesaid, the defendant Hampton Inn failed to take adequate and proper measures to protect the rights and safety of me or to warn me.
13. Defendant Hampton Inn negligently, carelessly and recklessly operated, supervised, controlled and managed the premises at issue.
14. Defendant Hampton Inn negligently carelessly and recklessly caused and allowed a dangerous condition to exist.
15. Defendant Hampton Inn failed to instruct its agent's servants or employees in the care and maintenance of the premises.  
Defendant Hampton Inn failed to remove or remedy the defective and dangerous conditions within a reasonable period of time.
16. I suffered the injuries complained of herein solely as a result of defendants' actions and bears no fault in same.
17. Upon information and belief, defendant Mantua Manufacturing Co. designed, tested, manufactured, sold and promoted the bed frame that injured me on or about April 16, 2014.
18. Defendant Mantua Manufacturing Co was careless in the design, testing, inspection, manufacture, distribution, labeling, sale and promotion of the bed frame.

19. As a result of defendant's conduct, I was seriously injured and has sustained pain, suffering and serious injury, including but limited to laceration, ecchymosis and tissue necrosis.
20. The bed frame was defective in that it entailed a protruding piece of sharp metal which ultimately lacerated me.
21. Defendant Mantua failed to warn me of the defective and dangerous condition of the bed frame.
22. As a result defendant Mantua Manufacturing Co. has breached implied warranties and is strictly liable to me for the injuries suffered.

Dated: April 8, 2016

  
Barbara Lioudis

Sworn to before me this 8<sup>th</sup> day of April 2016



MICHAEL COBBS  
Notary Public, State of New York  
#6004548 Wayne County  
Commission Expires March 23, 2018



FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 135 Vin Gate Drive, Rochester, NY 14616

Address of Defendant: 1853 William Penn Way, Lancaster PA 17605

Place of Accident, Incident or Transaction: Hampton Inn, 545 Greenfield Rd., Lancaster, Pennsylvania 17601  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes

No

Does this case involve multidistrict litigation possibilities?

Yes

No

*RELATED CASE, IF ANY:*

Case Number: \_\_\_\_\_ Judge: \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes  No
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes  No
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes  No
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes  No

CIVIL: (Place  in ONE CATEGORY ONLY)

A. *Federal Question Cases:*

1.  Indemnity Contract, Marine Contract, and All Other Contracts
2.  FELA
3.  Jones Act-Personal Injury
4.  Antitrust
5.  Patent
6.  Labor-Management Relations
7.  Civil Rights
8.  Habeas Corpus
9.  Securities Act(s) Cases
10.  Social Security Review Cases
11.  All other Federal Question Cases

(Please specify) \_\_\_\_\_

B. *Diversity Jurisdiction Cases:*

1.  Insurance Contract and Other Contracts
2.  Airplane Personal Injury
3.  Assault, Defamation
4.  Marine Personal Injury
5.  Motor Vehicle Personal Injury
6.  Other Personal Injury (Please specify)  
7.  Products Liability
8.  Products Liability — Asbestos
9.  All other Diversity Cases  
(Please specify) Premises liability personal injury claim

**ARBITRATION CERTIFICATION**

(Check Appropriate Category)

I, Barbara Lioudis, do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: 4/8/16

*Barbara Lioudis*

XXXXXXXXXXXX

XXXXXXXXXXXX

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: \_\_\_\_\_

*Barbara Lioudis*

XXXXXXXXXXXX

APR 11 2016 XXXXXXXXXX



Barbara Lioudis,

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

Plaintiff

v.

CIVIL ACTION

HIGH CORPORATE SERVICES, LILAC, d/b/a /HAMPTON INN;  
Defendants

NO. **16 1708**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

4/8/16

*Barbara Lioudis*

Barbara Lioudis

Date

Attorney at law

Attorney for xx

585-621-8269

Telephone

FAX Number

E-Mail Address

(Civ. 660) 10/02

APR 11 2016